

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

FEB 01 2019
David J. Bradley, Clerk of Court

United States of America)
V.) Case No. B-19-191-MJ
1 Romeo Aaron Gutierrez)
2 Jaime Ledesma)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2019 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

Code Section

Title 21, United States Code, Section 841(a)(1) & 846

Offense Description

Knowingly and intentionally possess with intent to distribute 33.50 kilograms of cocaine, a Schedule II controlled substance and did conspire with persons known and unknown to knowingly and intentionally possess with intent to distribute 33.50 kilograms of cocaine.

This criminal complaint is based on these facts:

On January 31, 2019, special agents were conducting surveillance and observed a 2014 GMC Sierra arrive and depart within approximately (2) minutes from a residence at [REDACTED] in Brownsville, Texas. Special agents coordinated an outbound inspection of the vehicle and interviewed the driver, Romeo Aaron GUTIERREZ, who admitted post Miranda to delivering 30 individually packaged bundles of cocaine to [REDACTED]. Special agents responded to [REDACTED]. [REDACTED] obtained consent to search from Resident owner Jaime LEDESMA, subsequently recovering 30 individually packaged bundles (approximately 33.50 kilograms) containing a white powdery substance, which field tested positive for the characteristic of cocaine. Resident owner Jaime LEDESMA admitted to having received and storing the cocaine on the listed date for subsequent distribution.



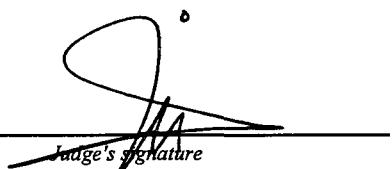
Continued on the attached sheet.



Complainant's Signature

Anthony Agular Special Agent

Printed name and title



Judge's signature

Ignacio Torteya III U.S. Magistrate Judge

Printed name and title

Brownsville, Texas
City and State

February 1, 2019
Date